



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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MKM:MCM/NEM  
F. #2015R00888

*610 Federal Plaza  
Central Islip, New York 11722*

January 18, 2017

**By Hand and ECF**

The Honorable Carol B. Amon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Qian Zheng, et al.  
Criminal Docket No. 15-628 (CBA)

Dear Judge Amon:

The government respectfully submits this letter to request a seven-day adjournment on consent of the parties of the pretrial conference currently scheduled for January 19, 2017 at 10:00 a.m. The parties are engaged in substantial plea negotiations and, therefore, believe that there is a possibility that some or all of the issues that will be discussed during the pretrial conference, including the number of witnesses, various evidentiary issues, and the length of trial, may become moot. The government has conferred with defense counsel, James Kousouros, Esq. and Joyce David, Esq. and the parties are available on Thursday, January 26, 2017 at 11:00 a.m. or 11:30 a.m. for the pretrial conference. If the Court is

unavailable on January 26 as requested, the parties are happy to provide another mutually convenient time that will work with the Court's calendar.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

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